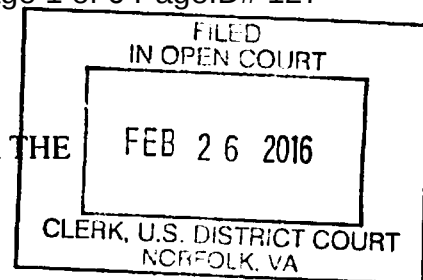


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Norfolk Division



UNITED STATES OF AMERICA

v.

MICHAEL JALMAR ZEIGLER,

Defendant.

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CRIMINAL NO. 2:15cr160

STATEMENT OF FACTS

By signing below, the parties and their respective counsel agree that if this case had gone to trial, the government's evidence would have established the following facts beyond a reasonable doubt:

1. From August 2015 to September 30, 2015, in the Eastern District of Virginia and elsewhere, the defendants, MICHAEL JALMAR ZEIGLER and ARTHUR DEMERILL SANTIFUL, knowingly and unlawfully committed a series of armed robberies of commercial retail outlets that were engaged in interstate commerce, at gun point, in order to obtain U.S. currency and commercial products. During each robbery, each of the defendants knowingly and intentionally aided and abetted the other in committing the robbery.

2. On August 21, 2015, in the City of Portsmouth, Virginia, in the vicinity of Ann Street and Hatton Street, within the Eastern District of Virginia, the defendants, MICHAEL JALMAR ZEIGLER and ARTHUR DEMERILL SANTIFUL, robbed a Pizza Hut delivery driver of U.S. currency and pizza belonging to Pizza Hut. During the robbery, the defendants assaulted the driver and stole his watch. As the defendants drove away, one of them fired a handgun in the

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Pizza Hut driver's direction, leaving behind shell casings. This incident forms the basis for Count Three of the indictment.

3. On September 4, 2015, in the City of Newport News, Virginia, the defendants, MICHAEL JALMAR ZEIGLER and ARTHUR DEMERILL SANTIFUL, robbed a Quality Inn hotel and took U.S. currency belonging to the Quality Inn and a wallet from a hotel employee while she was acting in her capacity as an employee of Quality Inn. During the robbery, one of the defendants pointed a gun at the Quality Inn employee.

4. On September 8, 2015, in the City of Portsmouth, Virginia, the defendants, MICHAEL JALMAR ZEIGLER and ARTHUR DEMERILL SANTIFUL, robbed a 7-Eleven convenience store and took U.S. currency and cigarettes belonging to the 7-Eleven convenience store from a 7-Eleven convenience store employee. During the robbery, one of the defendants pointed a gun at the 7-Eleven convenience employee.

5. On September 13, 2015, in the City of Portsmouth, Virginia, the defendants, MICHAEL JALMAR ZEIGLER and ARTHUR DEMERILL SANTIFUL, robbed a 7-Eleven convenience store and took U.S. currency and cigarettes belonging to the 7-Eleven convenience store from a 7-Eleven convenience store employee. During the robbery, one of the defendants pointed a gun at the 7-Eleven convenience store employee.

6. On September 17, 2015, in the City of Virginia Beach, Virginia, the defendants, MICHAEL JALMAR ZEIGLER and ARTHUR DEMERILL SANTIFUL, robbed a 7-Eleven convenience store and stole U.S. currency, lottery tickets and cigarettes belonging to the 7-Eleven convenience store from a 7-Eleven convenience store employee. During the robbery, one of the

defendants pointed a gun at the 7-Eleven convenience employee and one of the defendants stole a cellphone from a patron.

7. On September 21, 2015, in the City of Virginia Beach, Virginia, the defendants, MICHAEL JALMAR ZEIGLER and ARTHUR DEMERILL SANTIFUL, robbed a 7-Eleven convenience store and took U.S. currency and cigarettes belonging to the 7-Eleven convenience store from a 7-Eleven convenience store employee. During the robbery, each of the defendants pointed what appeared to be a gun at the 7-Eleven convenience employee.

8. On September 23, 2015, in the City of Hampton, Virginia, the defendants, MICHAEL JALMAR ZEIGLER and ARTHUR DEMERILL SANTIFUL, robbed a 7-Eleven convenience store and took U.S. currency and cigarettes belonging to the 7-Eleven convenience store from a 7-Eleven convenience store employee. During the robbery, each of the defendants pointed what appeared to be a gun at the 7-Eleven convenience employee.

9. On September 26, 2015, in the City of Norfolk, Virginia, the defendants, MICHAEL JALMAR ZEIGLER and ARTHUR DEMERILL SANTIFUL, robbed a 7-Eleven convenience store and took U.S. currency and cigarettes belonging to the 7-Eleven convenience store from a 7-Eleven convenience store employee.

10. On September 30, 2015, in the City of Norfolk, Virginia, the defendants, MICHAEL JALMAR ZEIGLER and ARTHUR DEMERILL SANTIFUL, robbed a 7-Eleven convenience store and took U.S. currency and cigarettes belonging to the 7-Eleven convenience store from a 7-Eleven convenience store employee. During the robbery, one of the defendants placed a firearm against the forehead of a 7-Eleven convenience store employee, tapped the employee on the forehead with the firearm, and said, in sum and substance, "You're taking too

long. Hurry up or you're going to die tonight." This conduct forms the basis for Count Twelve of the indictment.

11. On September 30, 2015, in the City of Virginia Beach, Virginia, the defendants, MICHAEL JALMAR ZEIGLER and ARTHUR DEMERILL SANTIFUL, robbed a 7-Eleven convenience store and took U.S. currency and cigarettes belonging to the 7-Eleven convenience store from a 7-Eleven convenience store employee. During the robbery, one of the defendants pointed a gun at a 7-Eleven convenience store employee; during the same robbery, one of the defendants patted her down.

12. On September 30, 2015, in the City of Virginia Beach, Virginia, police officers recovered a Hi-Point Model JHP handgun that ARTHUR DEMERILL SANTIFUL discarded outside the 7-Eleven where MICHAEL JALMAR ZEIGLER was arrested. MICHAEL JALMAR ZEIGLER was read the *Miranda* warnings, waived his *Miranda* rights, and gave a statement in which he confessed to committing both robberies on September 30, 2015. In his statement, MICHAEL JALMAR ZEIGLER implicated ARTHUR DEMERILL SANTIFUL as the second robber.

13. ARTHUR DEMERILL SANTIFUL was arrested several days later, was read the *Miranda* warnings, waived his *Miranda* rights, and gave a statement in which he admitted to participating in all of the above listed robberies. In his statement, ARTHUR DEMERILL SANTIFUL implicated MICHAEL JALMAR ZEIGLER as the second robber in each of the above-listed robberies.

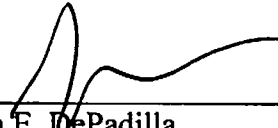
14. The acts taken by the defendant in furtherance of the offenses charged in this case, including the acts described above, were done willfully and knowingly with the specific intent to

violate the law. The defendant acknowledges that the foregoing statement of facts does not describe all of the defendant's conduct relating to the offenses charged in this case, and that it does not identify all of the persons with whom the defendant may have engaged in illegal activities. The defendant further acknowledges that he is obligated under his plea agreement to provide additional information about this case beyond that which is described in this statement of facts.

Respectfully submitted,

Dana J. Boente
United States Attorney

By:




Joseph E. DePadilla
Andrew C. Bosse
Assistant United States Attorneys
John F. Butler
Special Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, MICHAEL JALMAR ZEIGLER, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



MICHAEL JALMAR ZEIGLER
Defendant

I am the attorney for the defendant, MICHAEL JALMAR ZEIGLER. I have carefully reviewed the above Statement of Facts with him. His decision to enter into this factual stipulation is knowing, intelligent, and voluntary.



Defense Counsel

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